



Safeguarding Children and Young People Policy & Procedures

August 2022 (V0822)

Principles

The Arsenal Football Club Limited (“the Club”) is committed to safeguarding and protecting children and young people and fully accepts its responsibility for the safety and welfare of all children and young people who engage with the Club. Simple flowcharts on how to respond to a safeguarding concern and what constitutes abuse and neglect can be found in Appendices 1, 2, 3 and 4.

The welfare of children and young people is of paramount importance and all children and young people have a right to be protected from abuse regardless of their gender, race, disability, sexual orientation, religion, belief or age. Through the application of policy, procedures and best practice, the Club promotes the safety, welfare and well-being of all children and young people enabling them to participate in any Club activity in an enjoyable, safe, inclusive and child-centred environment. This equally applies to the safety and security of those working with and who are responsible for the activities involving children and young people.

Employees, workers, consultants, agency staff and volunteers who come into contact with children and young people in club related activities should be positive role models and display high moral and ethical standards in line with the club’s vision and values.

This Policy and Procedures is approved by Islington Safeguarding Children Board and is compliant with legislation including but not limited to the Children Acts 1989 and 2004, statutory guidance such as Working Together to Safeguard Children 2018 and governing body rules and regulations including the FA Premier League Rules and FA Regulations. This Policy and Procedure should be read in conjunction with related club policies and procedures, a list of which are available in Appendix 5.

Scope

This Policy is for use across the club and is to be observed by all those working and coming into contact with children and young people to ensure best practice in safeguarding is promoted and adhered to.

Activities undertaken at the following locations/departments are under the remit of this policy including:

- Arsenal in the Community
- Arsenal First Team and Academy training ground (London Colney);
- Arsenal Women Football Club;
- Arsenal Soccer Schools;
- Emirates Stadium;
- Junior Gunners;
- Arsenal Retail stores (including The Armoury and Highbury House);

- Stadium tours, Museum tours, Stewarding and all other activities on matchdays and roles that come into contact with children and young people;
- Travel, Events and Supporter Liaison;
- Youth Academy (Hale End); and
- Other Club related entities/activities undertaken outside of the UK.

All employees and workers are made aware of the Policy and Procedures through induction and where appropriate their work with children and young people will be supported by a comprehensive on-going safeguarding training programme.

Definition of a child

A child or young person is defined as anyone up to their 18th birthday.

Children Act 1989

Safeguarding children and young people is defined as:

- Protecting children and young people from maltreatment;
- Preventing impairment of children or young peoples’ health or development;
- Ensuring that children and young people are growing up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children and young people to have the best life chances.

Working Together to Safeguard Children 2018

Recruitment and disclosure

As part of the Club’s recruitment and selection process, offers of work for positions which come into contact with children and young people are subject to a satisfactory self-declaration and a criminal record check (“DBS Check”) as relevant, CV checks, appropriate references, right to work in the UK checks and a qualification check, if applicable. All offers of work are subject to a satisfactory outcome to the rigorous screening process and until such time that all background checks are deemed as acceptable by the Club, the person concerned is not permitted to commence work.



Safeguarding Children and Young People Policy & Procedures

All employees, workers, consultants, agency staff and volunteers in a position of trust are required to undergo regular DBS checks, normally every three years or earlier if required.

Should any person's DBS check reveal any cautions, convictions, community resolutions, warnings or final reprimands the Club will consider whether the nature of the offence/offences renders the person concerned unsuitable for working with children and young people. In such circumstances, when the nature of any disclosure has to be considered, a risk assessment is carried out to evaluate the information contained within the disclosure certificate. The person may also be required to attend a risk assessment meeting with a Departmental Safeguarding Officer (DSO) and/or a member of the Club's Safeguarding Team prior to a recruitment decision being made. Further information can be found in the Club's Recruitment Policy and Safer Recruitment Guidance available on the Club's intranet.

All new employees, workers, consultants, agency staff and volunteers working with children and young people at the Club are required to complete a self-declaration on commencement of duties.

When the Club uses suppliers or agencies to undertake its work, they are be subject to rigorous vetting and safeguarding checks and required to adhere to the Club's policy and procedures as set out in their contracts or service level agreements where relevant.

When the Club engages with schools and organisations in connection with child or young people related activities, where appropriate the Club writes to the school or organisation to state the Club's policy and procedures in relation to criminal record checks and safe recruitment. The Club only discloses the name, date of birth, disclosure and issue numbers of the employees, workers, consultants, agency staff or volunteers criminal record checks. Disclosure information in relation to checks will not be divulged. Schools and organisations are required to comply with the Club's safeguarding arrangements as set out in contracts and/or service level agreements.

Induction and training

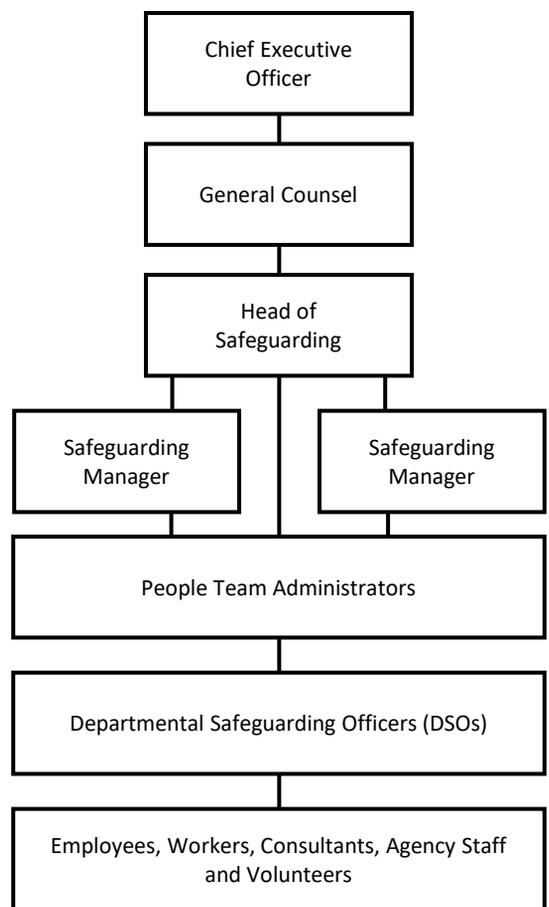
During the induction process, employees who work with or come into contact with children and young people are required to attend the Club's safeguarding and protection training along with the Premier League's safer working practice training. Employees also receive a copy of this Policy and Procedures as well as other Club policies and are required to sign an acknowledgement that they have read and agree to abide by them.

Workers, consultants, agency staff and volunteers who have roles that work with or come into contact with children and young people undertake both Club and Premier League training. They also receive copies of the Club's Safeguarding Policies and Procedures and are expected to read and abide by them as set out in their Agreements.

Refresher safeguarding training is provided every three years or earlier as required.

Roles and responsibilities

The Club has a comprehensive safeguarding structure which ensures the safety and welfare of all children and young people who engage with the Club. For the purpose of this Policy and Procedure the Safeguarding Team consists of the Head of Safeguarding, the Safeguarding Coordinators and the People Team Administrators.



The Club's **Chief Executive Officer** is responsible for ensuring that safeguarding is a key priority at the Club and for providing Club-wide strategic leadership that assists the Club to deliver the safeguarding strategy, vision, values, priorities, policies, promoting the welfare of vulnerable groups, communicating at Executive level.

The Club's **Head of Safeguarding** is responsible for the strategic and operational direction and embedding safeguarding across the Club. The Head of Safeguarding is also lead point of contact should safeguarding concerns arise and the Lead Disclosure Officer. If the Head of Safeguarding is absent from work for an extended period or the position becomes vacant, the **General Counsel** will assume the positions of Head of Safeguarding and Lead Disclosure Officer. Should this situation arise, the new arrangement will be clearly communicated across the Club.



Safeguarding Children and Young People Policy & Procedures

The **Safeguarding Managers** are responsible for all operational aspects and embedding safeguarding in all of the football and community departments as well as being the lead point of contact in all those areas.

People Team Administrators are responsible for ensuring all vetting checks including criminal record checks adhere to the Club's Recruitment Policy as well as legislation and governing body rules.

Departmental Safeguarding Officers (DSO's) are responsible for embedding safeguarding within their own departments as well as being the point of contact should a concern arise within their own departments.

Employees, workers, agency staff, consultants and volunteers are responsible for familiarising themselves with the Club's policy and procedures, ensuring the safety and welfare of all children and young people as well as promoting best practice and creating a safe and inclusive environment to prevent harm occurring through awareness of what constitutes abuse and neglect.

Abuse and neglect

Abuse is defined as a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children or young people may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child, children, young person or young people.

There are four recognised categories of abuse as defined in Working Together to Safeguard Children 2018:

1. Physical abuse;
2. Sexual abuse;
3. Emotional abuse (includes bullying); and
4. Neglect.

In addition, Keeping Children Safe in Education 2020 recommends the addition of two further categories (or sub-categories) of abuse:

5. Child Sexual Exploitation (CSE)
6. Child Criminal Exploitation (CCE)

Full descriptions of each category of abuse and neglect can be found in Appendix 4.

Children and young people may be at additional risk of abuse and neglect through some of the additional vulnerabilities they may face.

Additional vulnerabilities

If children and young people have additional vulnerabilities when engaging with the Club, further safeguards may need to be put in place to reduce the potential risk of abuse and neglect.

Contextual Safeguarding

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. The different relationships that young people form in their local communities, peer groups, schools and online can feature violence and abuse, and parents and carers have little influence over these contexts. The Club is therefore committed to understanding these risks, and engaging with children and young people to help keep them safe.

Radicalisation and extremism

Radicalisation and extremism of children and young people is a form of emotional abuse. HM Government states that the aim of radicalisation is to attract children and young people to a particular extremist ideology. In many cases it is with a view to inspiring children and young people eventually to become involved with harmful or terrorist activities. Radicalisation can take place through direct personal contact, or indirectly through social media. Extremism is defined as vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

Looked after children and young people

Looked after children and young people (such as those living in foster care) may be especially vulnerable to abuse and neglect for a number of reasons, including:

- Experienced abuse and neglect previously;
- Living with people who are not their immediate family or friends;
- Less support networks; and
- Stigma for being in care.

Online world

Although the online world provides many benefits to children and young people, there are also a number of potential associated risks:

- Inappropriate language or images;
- Online grooming;
- Cyberbullying; and
- Sexting.

Further information about the online risks is contained in the Club's Safeguarding Social Media Policy and Procedures which can be accessed on the Club's intranet.



Safeguarding Children and Young People Policy & Procedures

Deaf and disabled children and young people

The Equality Act (2010) defines a person as disabled if they have a physical or mental impairment which has a substantial and long term (has lasted or is expected to last at least 12 months) adverse effect on one's ability to carry out normal day-to-day activities. This definition includes conditions such as cancer, HIV, mental illness and learning disabilities.

Deaf and disabled children and young people may be vulnerable to abuse for a number of reasons:

- Increased likelihood of social isolation;
- Dependency on others for practical assistance in daily living (including intimate care);
- Impaired capacity to resist, avoid or understand abuse;
- Speech and language communication needs may make it difficult to tell others what is happening;
- Limited access to someone to disclose to; and
- Particular vulnerability to bullying.

Children and young people with disabilities may also feel less valued than his/her peers and poor care may be observed but tolerated by others. This might include such things as not speaking directly to the child or young person; not offering choices; not moving and handling them safely; not respecting his/her privacy and dignity; not treating him/her according to his/her age; allowing physical restraint to occur; or using derogatory language.

There is no single route to ensure that children and young people are protected, especially those with additional vulnerabilities. However, the safest environments are those that help children and young people to protect themselves by helping them to speak out and do their best to stop any abuse and neglect from happening and take responsibility for observing, challenging and reporting any poor practice and suspected abuse and neglect.

Safe environments for children and young people with additional vulnerabilities are also safer for all children and young people.

Mental Health

Adverse experiences, like abuse and neglect, can have a lasting impact on a child's mental health, behaviour and education.

While only professionals should diagnose mental health problems, staff must be alert to identifying behaviour which may indicate that a child is experiencing mental health problems or is at risk of developing one.

Staff should immediately raise any mental health concerns which are / may be also safeguarding concerns with the Safeguarding Team via completion of a MyConcern form (Appendix 8).

Use of photography and film

All images are taken by Club photographers who have been briefed by a Club Departmental Safeguarding Officer (DSO) or by a member of the Communications Department responsible for the activity being photographed or filmed in an appropriate way and manner. Where appropriate and possible, parent/carer consent is sought in writing at the start of the season or prior to an event. The Club adhere to the following principles when using photography or film:

- All children or young people featured in Club publications are appropriately dressed;
- Where possible, the image will focus on the activity taking place and not a specific child or young person;
- Where appropriate, images represent the broad range of people participating safely in the event;
- Designated Club photographers will, where applicable, undertake a CRC check and attend the Club's and FA Safeguarding workshop and in any case will be personally responsible for keeping up to date with the latest guidelines on the 'Use of Images' policies from the Premier League. Club identification is worn at all times;
- Children or young people who are the subject of a court order will not have his/her images published in any Club document;
- No images of children or young people featured in Club publications are accompanied by personal details such as his/her home address;
- Recordings of children and young people for the purposes of legitimate coaching aids are only filmed by Club officials and are stored safely and securely at the Club's premises;
- Any instances of inappropriate images in football should be reported to a DSO or the Club's Safeguarding Team;
- The Club does not put young players under the age of 16 profiles, images and personal information on its website.

Good practice and code of conduct

To ensure all children and young people have the most positive and safe experience when engaging with the Club, all employees, workers, consultants, agency staff and volunteers should adhere to the following principles and action (to ensure they role model positive behaviours and so reduce the risk of allegations, abuse and neglect occurring):

- Listen carefully to children and young people about his/her needs, wishes, ideas and concerns and take them seriously;
- Treat all children and young people equally not showing favouritism;



Safeguarding Children and Young People Policy & Procedures

- Always work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets);
 - Make the experience fun and enjoyable;
 - Promote fairness, confront and deal with bullying;
 - Maintain a safe and appropriate distance with children and young people and avoid unnecessary physical contact;
 - Where any form of manual/physical support is required, it should be provided openly and with the consent of the child or young person;
 - If children and young people have to be supervised in changing rooms always ensure coaches etc. work in pairs;
 - Request written consent if the Club are required to transport children and young people using the Club's Multi-Use Consent Form (Appendix 6) for any activities, events or significant travel arrangements e.g. overnight stays;
 - Employees and workers should maintain their qualifications and professional development;
 - A qualified first aider is in attendance or readily available;
 - Maintain appropriate professional relationships with children and young people, including only engaging with them online with prior approval and through the Club's social media channels;
 - On trips, ensure that adults should not enter a child or young person's room unless there is a safety concern, in which case two adults should enter and should not invite children or young people into their rooms;
 - Be a good role model, this includes not swearing, smoking or drinking alcohol in the company of children and young people;
 - Always give enthusiastic and constructive feedback rather than negative criticism;
 - Promote the Club's vision and values and be an ambassador for those values;
 - Ensure children and young people adhere to his/her relevant Code of Conduct;
 - Secure written consent for the Club to administer emergency first aid or other medical treatment if the need arises;
 - Reward effort as well as performance;
 - Challenge unacceptable or inappropriate behaviour;
 - Encourage children and young people to take responsibility for their own behaviour and performance;
 - Keep a written record of any incident or injury that occurs, along with details of any treatment given or action taken using the Club's Accident and Incident Report Form (Appendix 7).
 - Recording safeguarding concerns on the MyConcern or the Safeguarding Concern Form (Appendix 8).
- This list is not exhaustive.
- ### Unacceptable practice
- The following are regarded as unacceptable practice and should be avoided by all employees, workers, consultants, agency staff and volunteers (*list not exhaustive*):
- Unnecessarily spending excessive amounts of time individually with a child or young person away from others;
 - Being alone in changing rooms, toilet facilities or showers used by children and young people;
 - Taking children and young people alone in a car or journey unless written consent is sought from the Club's Safeguarding Team for emergency situations;
 - Taking children and young people to your home or places where they will be alone with you;
 - Sharing a room with children and young people;
 - Engaging in rough, physical or sexually provocative games, including horseplay;
 - Allowing or engaging in inappropriate touching of any form;
 - Allowing children and young people to use inappropriate language unchallenged;
 - Making sexually suggestive comments to children and young people, even in fun;
 - Reducing children and young people to tears as a form of control;
 - Allowing allegations made by children and young people to go unchallenged, unrecorded or not acted upon;
 - Doing things of a personal nature that children and young people can do for themselves;
 - Not recording safeguarding concerns on MyConcern or the Safeguarding Concern Form;
 - Sending inappropriate text messages or social media messages to children and young people;
 - Having children or young people engaged with the Club as 'friends' or 'followers' within social networking sites such as Facebook, Twitter and Instagram; and
 - Engaging with children and young people on 'one to one' personal electronic communications.

Safeguarding Children and Young People Policy & Procedures

Searching children and young people

To ensure the safety and security for all Club activities all children and young people may be subject to the Club's search process. Children and young people are asked to self-search as the preferred method; however, should the Club suspect that the child or young person may be concealing a prohibited item, consent will be sought from their parent/carer before a Steward or Security member of the same sex who is being observed by a Supervisor searches the child.

Lost or missing children and young people

During Club activities every effort is made to ensure children and young people remain with their parents/carers or the activity leaders. Should a child or young person become lost or go missing during a Club activity every effort will be made to locate the child or young person as quickly as possible. Should a child or young person not be located within a reasonable timeframe, contact will be made with their parents/carers and the police to file a missing child/young person's report.

Children and young people who are not picked up on time

All parents and carers should collect their child or young person on time in line with the instructions given by the Club. Should the child or young person not be collected on time a minimum of two appropriate adults will wait at the venue until the parent or carer arrives. Should the child or young person not be picked up at all, a Club employee or worker will contact the DSO or the Club's Safeguarding Team. Should sufficient time pass, the Club may contact the police and/or children's services to take care of the child or young person until their parent or carer is contacted.

Risk assessments

For all Club activities including, trips, tours, events and activities, thorough risk assessments are completed to identify and minimise potential risks. The Club's Health and Safety Policy outlines the process to undertake when completing risk assessments as well as how to capture information regarding accidents and incidents and how the Club learns from such matters.

Where a child or young person is involved in a trip, activity or event, a risk assessment must take account of his/her particular vulnerabilities whilst in the Club's care. The risk assessment will set out what arrangements are in place for his/her care and supervision and how risks will be minimised.

Activity leaders will be required to continually monitor and amend the controls within the risk assessments whilst leading such activities.

Supervision of children and young people

The Club adheres to best practice guidance set out by the FA in relation to the supervision of adults to children/young people. Generally, there should always be a minimum of two adults and an adult to child/young person ratio of:

- 0 – 7 years of age, one adult to every ten children;
- 8 – 17 years of age, one adult to every sixteen children/young people.

Particular activities may require more or less adult to child/young person ratios due to:

- Age, needs and ability of children and young people;
- Nature of the activity and environment;
- Risk assessments or intelligence information identifying potential behavioural or other issues;
- Expertise and experience of the staff involved;
- Mixed gender children and young people activities will require adults of both genders to supervise where possible.

Should the ratio not be suitable, the Club's Safeguarding and Health and Safety Teams decide whether the activity or event takes place.

Working with external partners

The Club always ensures external partners and organisations we engage with promote the safety and welfare of children and young people and this is outlined in contracts and/or service level agreements. External partners and organisations are required to demonstrate competencies in safeguarding and the Club assesses this through its own safeguarding audits. Where organisations do not have their own satisfactory safeguarding arrangements, they will be expected to comply with the Club's standards.

Referrals

If the Club has safeguarding concerns in relation to a child, young person or their parents/carers the Club may refer these concerns to external agencies. External agencies include, but are not limited to, children's social care, adult social care, the police, health agencies, the FA and the Premier League (Appendices 1, 2 and 3).

Confidentiality

Every effort should be made to ensure that confidentiality of safeguarding cases is maintained for all concerned. Information should be handled and disseminated on a need-to-know basis only which would not normally include anyone other than the following:

- The Safeguarding Team and General Counsel;
- The child or young person or the person raising the concern;



Safeguarding Children and Young People Policy & Procedures

- The employee, worker, consultant, agency staff or volunteer who received the concern or disclosure;
 - The parents/carers of the child or young person who is alleged to have been abused, where appropriate;
 - Local Authority and Police;
 - Dependent on role, the National Governing Body.
3. Advice is sought from the Club's Safeguarding and/or Legal Team if there is any doubt about sharing the information concerned, without disclosing the identity of the child or young person where possible;
 4. Information is shared with informed consent where appropriate and, where possible, there is respect for the wishes of those who do not consent to share confidential information. Information will still be shared without consent if, in the Club's judgement, there is good reason to do so, such as where safety may be at risk. Judgement will be based on the facts of the case;
 5. Safety and well-being of the child or young person is always considered;
 6. Information is only shared when it is necessary, proportionate, relevant, adequate, accurate, timely and secure to do so;
 7. Records of the Club's decision to share information in relation to any reported concerns, with whom and the reasons are always recorded on the Safeguarding Concern Form (Appendix 8).

Employees, workers, consultants, agency staff and volunteers may have access to confidential information about children and young people in order to undertake their responsibilities. In some circumstances, employees, workers, consultants, agency staff or volunteers may be given highly sensitive or private information. Confidential or personal information about a child or young person or his/her family should not be used for their own or others advantage.

Confidential information about a child or young person should never be used casually in conversation or shared with any person other than on a need-to-know basis. In circumstances where the child or young person's identity does not need to be disclosed, the information should be handled anonymously.

There are some circumstances in which an employee, worker, consultant, agency staff or volunteer may be expected to share information about a child, for example when abuse is alleged or suspected. In such cases, employees, workers, consultants, agency staff and volunteers have a duty to pass information on without delay, but only to those with designated safeguarding responsibilities (DSO and Safeguarding Team).

If an employee, worker, consultant, agency staff or volunteer is in any doubt about whether to share information or keep it confidential, guidance should be sought from the Club's Safeguarding or Legal Teams. The storing and processing of personal information about children and young people is governed by the Data Protection Act 2018.

Information sharing

The Club abides by the seven guiding principles as set out by HM Government on sharing information:

1. The Data Protection Act 2018, the General Data Protection Regulation 2018 and human rights laws are not barriers to justified information sharing, but provide a framework to ensure that personal information about children and young people is shared appropriately;
2. Openness and honesty with the child or young person (and/or their parents/carers or family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek agreement, unless it is unsafe or inappropriate to do so;

The Club will share information with the relevant statutory agencies, the Premier League and FA where appropriate in relation to safeguarding cases.

Review

The Club shall review this Policy and Procedures at the end of every season or whenever there is a change in legislation, guidance, governing body rules or learning from safeguarding cases.

Safeguarding Children and Young People Policy & Procedures

Procedures

Consent

The first priority in safeguarding should always be to ensure the safety and welfare of the child or young person. If concerns arise, it is best practice to always gain the consent of the child or young person before an external referral is made. There are a number of circumstances whereby an external referral can be made without consent and these include:

- The child or young person is at risk of harm;
- Other people are, or may be, at risk, including other children or young people;
- Emergency or life-threatening situations may warrant the sharing of relevant information with the emergency services without consent;
- Sharing the information could prevent a serious crime;
- The child or young person lacks the mental capacity to make that decision;
- A serious crime has been committed;
- There is a risk of significant harm and meets the threshold for a multi-agency strategy meeting;
- Employees, workers, consultants, agency staff or volunteers are implicated.

What to do if you suspect abuse or poor practice has occurred?

If you are concerned about the safety or welfare of a child or young person or you are concerned about an adult's behaviour towards a child or young person you must act. Do not assume that someone else will help the child or young person. Safeguarding children and young people is everyone's responsibility. It is important that you report your concerns to one of the following:

- Departmental Safeguarding Officer;
- Safeguarding Team; or
- General Counsel

Taking no action is not an option.

What to do if you receive a safeguarding disclosure from a child or young person

Children or young people who may be vulnerable are likely to disclose abuse or neglect to those they trust and how one responds to a disclosure is crucial.

Stage 1

Deal with the disclosure as it happens and ensure that the child or young person's immediate needs are met and that he/she feels supported. When a disclosure is made, it is most important to understand that you must not investigate the disclosure yourself. The disclosure must always be taken seriously and dealt with according to the guidance in this Policy and Procedure, even if the validity of the disclosure is uncertain.

You are not expected to act as a social worker, counsellor, judge, and jury or avenge the abuser; you are however expected to act in the best interest of the child or young person who may be at risk.

You must:

- Put your own feelings aside and listen as if the information is not sensational;
- Allow the child/young person to lead the discussion and to talk freely;
- Listen to what the child/young person is saying without investigating. Try not to interrupt them or ask lots of questions. Being asked a lot of questions can feel like being interrogated;
- Allow the child or young person to tell you at his/her own pace;
- Don't worry if the child/young person stops talking for a while, silences are ok. You don't have to rush in to fill the gaps;
- Accept what the child/young person says without challenge;
- Allow the child/young person to talk but protect him/her from sharing the information with too many other people;
- Provide reassurance that you are taking them seriously and he/she have done the right thing by disclosing;
- Let the child/young person know it is recognised how hard it is for him/her to tell you;
- It is ok to let him/her know if you are unable to answer all their questions;
- Avoid asking leading questions, for example "Did the coach hit you?";
- Never ask questions that may make the child/young person feel guilty or inadequate;
- If physical abuse has taken place, you may observe visible bruises and marks but do not ask a child/young person to remove or adjust his/her clothing to observe them and do not take photographs of the injuries, you should make a note of the injuries on the Body Map in the Safeguarding Concern Form (Appendix 8);
- Tell the child/young person who you will be contacting e.g. Club's Safeguarding Team or DSO and that you will support him/her through that process;
- If you establish that they he/she has been harmed or is at risk of being harmed, do not pursue the conversation any further. This is important to ensure that questions cannot be raised later about possible manipulation of the disclosure;
- Respect the confidentiality of the disclosure and do not share the information with anyone other than those who need to know. Those who need to know are those who have a role to play in protecting children/young people; and
- After the child/young person has disclosed, the conversation must be documented remembering as accurately as you can, the words and phrases used by the child/young person to describe what happened to him/her.



Safeguarding Children and Young People Policy & Procedures

You must not:

- Panic or show that you are shocked. It is important to remain calm and in control of your feelings;
- Document the conversation while the child/young person is disclosing. This should be done as soon as possible after the child/young person has disclosed to you;
- Investigate;
- Give the impression that you might blame the child/young person. For example, don't ask: "Why did you let him?," "What were you doing there anyway?" or "Why didn't you tell me before?"
- Press for details by asking questions such as "What did he/she do next?"
- Ask leading questions;
- Pass judgment on what is said;
- Make false promises and/or promise confidentiality – it should be explained that the child/young person has done the right thing, outline who will need to be told and why;
- Approach the alleged abuser yourself.

Do remember, when a child/young person discloses they may feel:

- Guilt: he/she may blame themselves for the abuse and often feel guilt for telling.
- Ashamed: he/she may feel ashamed about the abuse itself.
- Confused: he/she may be confused about his/her feelings for the alleged abuser.
- Scared: he/she may be fearful of the repercussions of telling. He/she may be scared of the alleged abuser.
- Be careful about touching (e.g. hugging or cuddling) the child/young person if they have not initiated the contact. He/she may be upset by physical contact.

Stage 2

As soon as possible, once the immediate comfort and safety of the child or young person is secured, you must inform your DSO, or the Safeguarding Team of the disclosure. You may make a referral yourself directly to a statutory agency if you are concerned about the child/young person's immediate safety and/or are having difficulty contacting the designated safeguarding person/s or if the designated safeguarding person is the alleged abuser. Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need-to-know basis only.

Stage 3

You should raise a new Concern on MyConcern or complete the Club's Safeguarding Concern Form (SCF) as soon as possible after the disclosure has been made and send the SCF (Appendix 8) to the Safeguarding Team within 24 hours of the disclosure.

Wherever possible, you must record information as it was relayed to you using the language of the child or young person rather than your own interpretation of it.

What happens next?

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. You should be informed by the Club's Safeguarding Team what has happened following the report being made. If you do not receive this information, you should be proactive in seeking it out.

If you have concerns that the disclosure has not been acted upon appropriately, you should inform the Club's General Counsel and ultimately contact the relevant statutory agency.

And remember...

A disclosure is not the only way that you may be made aware of an issue. Sometimes another adult or even a child or young person may say something about a possible abusive situation. On occasions you may witness an incident that may cause concern or indeed you may pick up on things that cause concern or information may be passed to a coach or manager anonymously by a person or persons who do not want to be directly involved for whatever reason.

Raising a concern

You do not need to have firm evidence before raising a concern. But we do ask that you explain, as fully as you can, the information or circumstances that gave rise to your concern.

Step 1

If you have a concern of any form of safeguarding poor practice or abuse, raise it first with the Departmental Safeguarding Officer, who will raise it with the Club's Safeguarding Team.

Step 2

If you feel unable to raise the matter with the DSO for whatever reason, raise the matter with the Club's Safeguarding Team.

Step 3

If you feel the Safeguarding Team has not handled the concern appropriately you should contact the Club's General Counsel. If these channels have been followed and you still have concerns, or if you feel that the matter is so serious that you cannot discuss it with any of the above, you should contact the Head of Safeguarding at the Premier League on **020 7864 9000** or safeguarding@premierleague.com. For a flowchart of the process to follow, please see Appendices 1, 2 and 3.

Managing allegations against employees, workers, consultants, agency staff and volunteers

Should a concern arise about an employee, worker, consultant, agency staff or volunteer's conduct in relation to a child or young person, this should be reported to the Club's Safeguarding Team who will take such steps as considered necessary to ensure the safety of the child or young person in question and any other person who may be at risk. The person raising the concern should

Safeguarding Children and Young People Policy & Procedures

complete the Club's Safeguarding Concern Form or MyConcern (Appendix 8).

When managing an allegation against an employee, worker, consultant, agency staff or volunteer the Safeguarding Team will follow this process:

- The allegation will be referred to the Local Authority Designated Officer (LADO)/Designated Person at the Local Authority and/or the Police;
- The parent / carer of the child or young person will be contacted as soon as possible, following advice from statutory agencies;
- Senior Management will be notified and if applicable the Premier League and the FA;
- If a member of the Safeguarding Team is the subject of an allegation, the report must be made to the General Counsel who will refer the allegation to the appropriate statutory agencies;
- If required, a full investigation and possible sanction in accordance with the Club's Disciplinary Policy for employees will follow. Workers, consultants or agency workers may have their Agreements terminated;
- Referrals as appropriate will be made to the Disclosure and Barring Service (DBS).

An allegation may relate to a person who works with children who has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (see "Transferrable risk" below)

For a flowchart of the process to follow, please see Appendix 3.

Managing concerns for a child or young person

Any concern relating to the abuse of a child or young person by another child or young person must be dealt with through this Policy and Procedure. Any such concern should be reported immediately to the DSO who will inform the Safeguarding Team.

Transferrable risk i.e., behaviour that indicates an adult may not be suitable to work with children

In addition, there may be types of behaviour which may indicate a person poses, or might pose, a risk of harm if they continue to work in regular or close contact with children. This is more commonly known as the 'harm test', i.e. a person has 'behaved or may have behaved in a way that indicates they may not be suitable to work with children' (para 211 KCSIE 2021).

This could involve an incident that occurred outside of the Club, and may not involve children, but could have an impact on their suitability to work with them. For example, being involved in a domestic violence incident at home, where violent behaviour is triggered and could pose a risk to children at the Club. This is known as transferrable risk.

Staff should report any allegations of such behaviour by following this Policy and Procedure.

Making a referral

All employees, workers, consultants, agency staff and volunteers should raise a new Concern on MyConcern or complete the Club's Safeguarding Concern Form (Appendix 8) after referring any case to the DSO and/or Safeguarding Team. The Safeguarding Team will contact the relevant Local Authority Children's Services Team completing their Referral Form and update the Safeguarding Concern Form for the Club's records.

What to do if a child or young person is in danger of immediate harm

The first priority is to ensure the child or young person is in a safe place away from the alleged perpetrator. Emergency services should be summoned whenever a situation is felt to be beyond the control of employees, casual workers, agency staff, consultants or volunteers. In addition, employees, workers, consultants, agency staff and volunteers should have, readily available, all the contact numbers of the Club's Safeguarding Team, DSOs, colleagues, or other services which can assist in an emergency or urgent situation (Appendix 9).

Report the matter to the Safeguarding Team and/or General Counsel at the earliest opportunity.

In the absence of the Safeguarding Team and/or General Counsel, contact the London Borough of Islington Children's Services Team (telephone 020 7527 7400) and/or the police on 101 for help and to ensure the correct procedure is followed.

When to call the Police

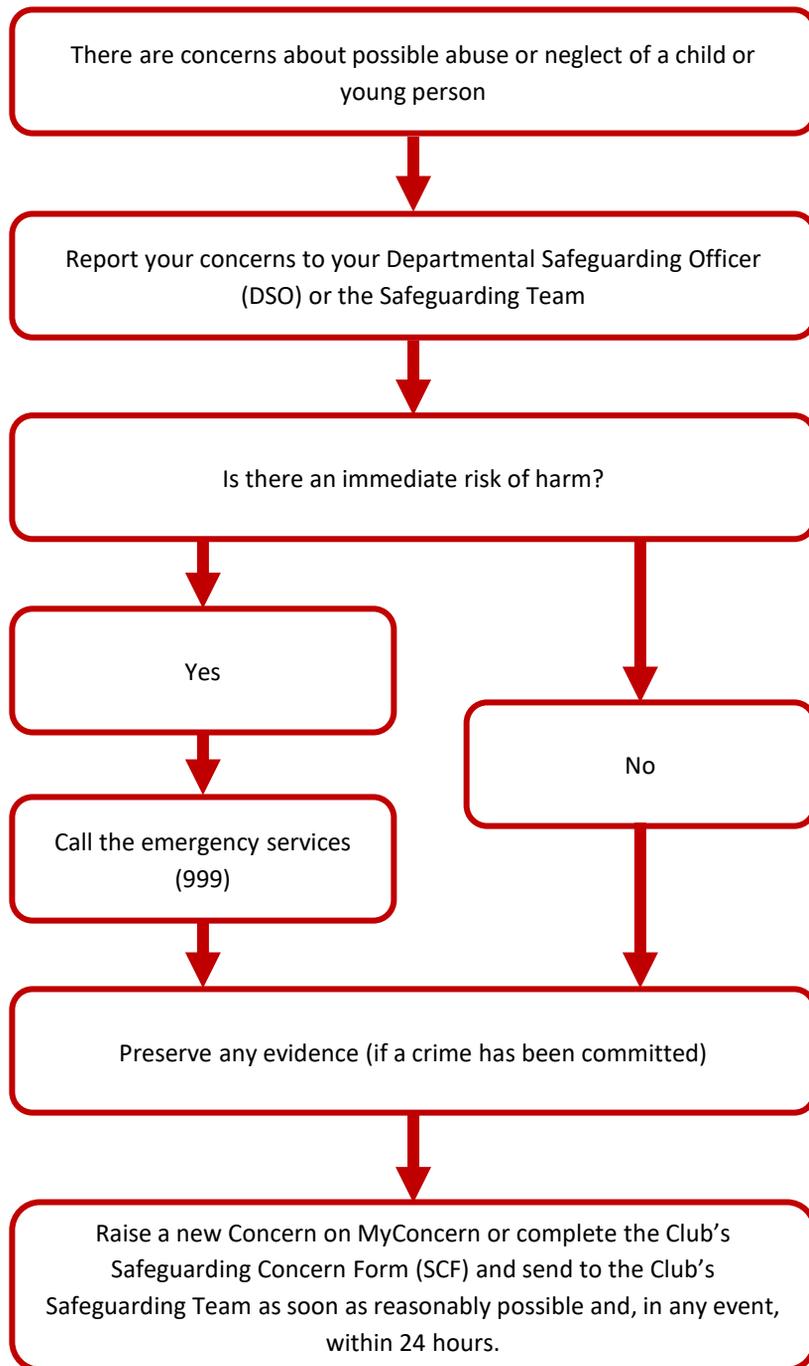
Even when a matter is not an emergency (e.g. no risk of immediate harm), consideration must still be made on whether to make a Police report and when liaising with the Police on any safeguarding matters.

The National Police Chief's Council (NPCC) have [created guidance](#) which helps to clarify when to consider calling the Police and what to expect when a report is made.

Safeguarding Children and Young People Policy & Procedures

Appendix 1

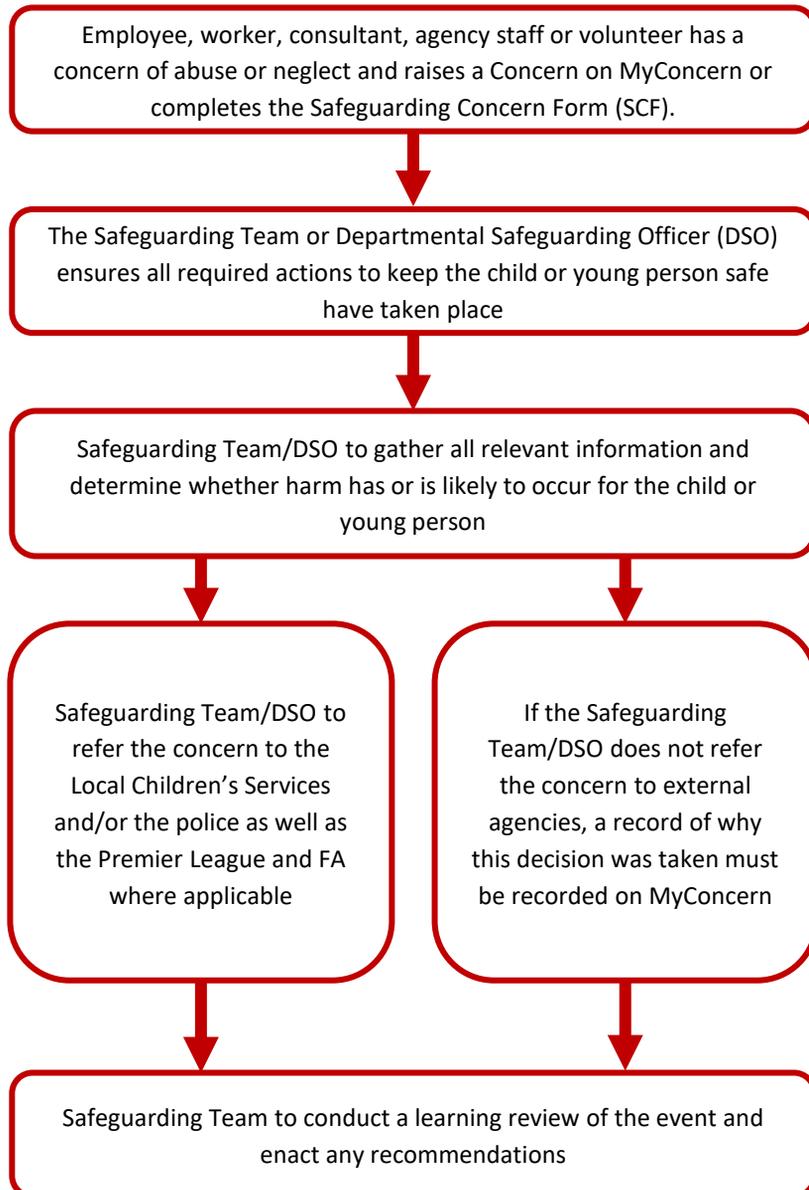
Flowchart for employees, workers, consultants, agency staff and volunteers who raise a concern about a child or young person



Safeguarding Children and Young People Policy & Procedures

Appendix 2

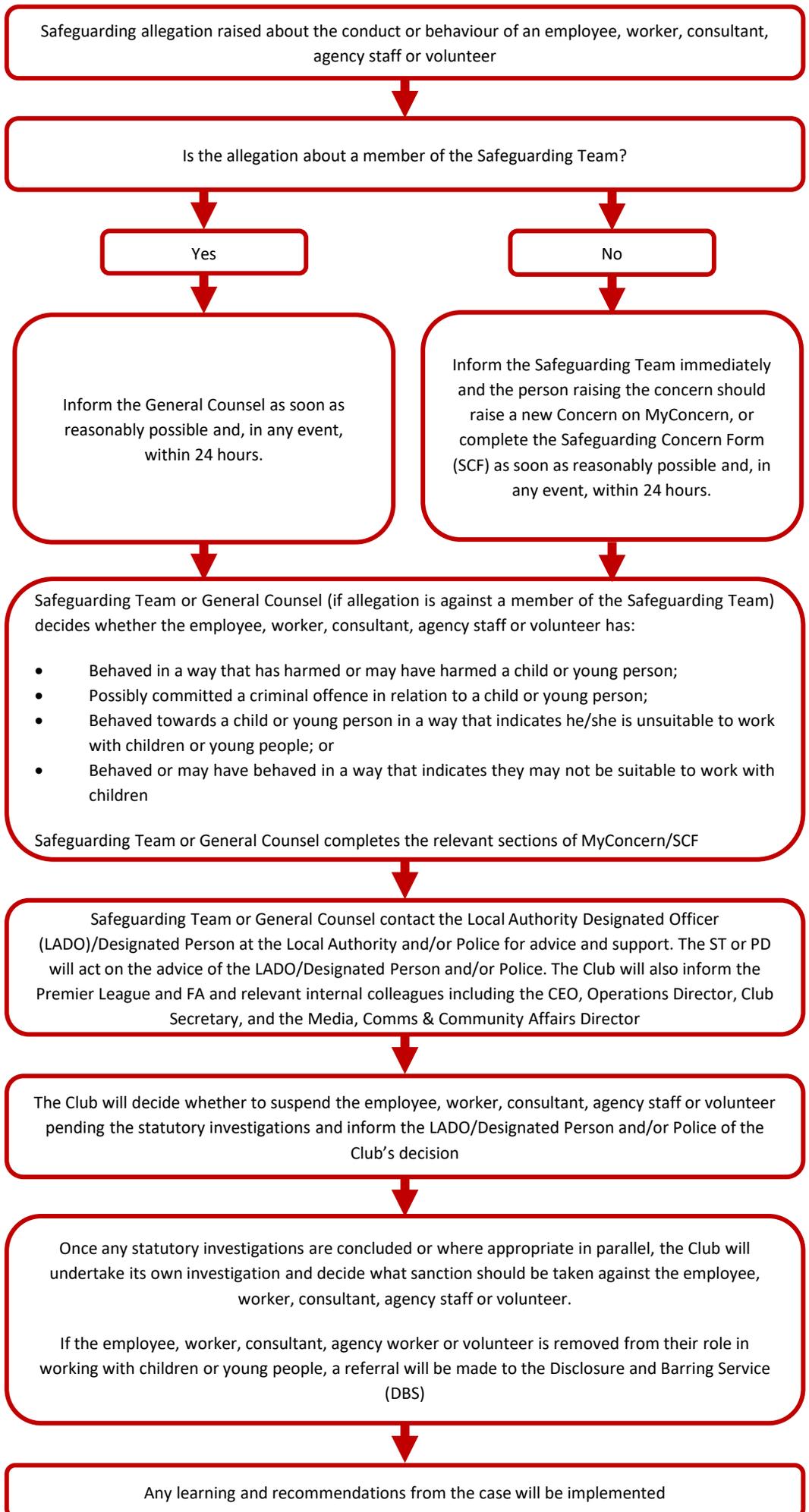
Flowchart for Departmental Safeguarding Officers (DSOs) and Safeguarding Team making a referral



Safeguarding Children and Young People Policy & Procedures

Appendix 3

Allegations against employees, workers, consultants, agency staff or volunteers flowchart



Safeguarding Children and Young People Policy & Procedures

Appendix 4

Categories of abuse and neglect as defined in Working Together to Safeguard Children 2018 and Keeping Children Safe in Education 2020

Physical abuse	A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child or young person. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child or young person.
Sexual abuse	Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child or young person is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children or young people in looking at, or in the production of, sexual images, watching sexual activities, encouraging children or young people to behave in sexually inappropriate ways, or grooming a child or young person in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children or young people.
Emotional abuse (including bullying)	The persistent emotional maltreatment of a child or young person such as to cause severe and persistent adverse effects on the child or young person's emotional development. It may involve conveying to a child or young person that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child or young person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children or young people. These may include interactions that are beyond a child or young person's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child or young person participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children or young people frequently to feel frightened or in danger, or the exploitation or corruption of children or young people. Some level of emotional abuse is involved in all types of maltreatment of a child or young person, though it may occur alone
Neglect	The persistent failure to meet a child or young person's basic physical and/or psychological needs, likely to result in the serious impairment of the child or young person's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: <ul style="list-style-type: none"> • Provide adequate food, clothing and shelter (including exclusion from home or abandonment); • Protect a child or young person from physical and emotional harm or danger; • Ensure adequate supervision (including the use of inadequate care-givers); or • Ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to a child or young person's basic emotional needs
Child Sexual Exploitation (CSE)*	Child sexual exploitation is a form of child sexual abuse (above). It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.
Child Criminal Exploitation (CCE)*	Criminal exploitation is child abuse where children and young people are manipulated and coerced into committing crimes.

*KCSIE 2020 Update

*KCSIE 2020 Update



Safeguarding Children and Young People Policy & Procedures

Appendix 4 (cont.)

Categories of abuse and neglect as defined in Working Together to Safeguard Children 2018 and Keeping Children Safe in Education 2020

Category of abuse and neglect	Physical Signs	Behavioural Signs
Physical abuse	Unexplained and unusual bruising, finger and strap marks, injuries, cigarette burns, bite marks, fractures, scalds, missing teeth	Fear of contact, aggression, temper, running away, fear of going home, reluctance to change or uncover body, depression, withdrawal, bullying or abuse of others
Sexual Abuse	Genital pain, itching, bleeding, bruising, discharge, stomach pains, discomfort, pregnancy, incontinence, urinary infections or STIs, thrush, anal pain on passing motions	Apparent fear of a person, nightmares, running away, sexually explicit knowledge or behaviour beyond their years, masturbation, bed-wetting, eating problems, substance abuse, unexplained money or gifts, acting out with toys, self-harm
Emotional Abuse	Weight change, lack of growth or development, unexplained speech disorders, self-harm, clothing inappropriate for child's age, gender or culture etc.	Unable to play, fear of mistakes, fear of telling parents, withdrawn, unexplained speech and language difficulties, few friends
Bullying	Weight change, unexplained injuries and bruising, stomach pains and headaches, bed-wetting, disturbed sleep, hair pulled out	Difficulty making friends, anxiety over school, truancy, withdrawn, anger, moodiness, suicide attempts, reduced performance, money and possessions reported as lost, stealing from within the family, distress and anxiety on reading texts or e-mails
Neglect	Constant hunger, ill-fitting or inappropriate clothes, weight change, untreated conditions, continual minor infections, failure to supply hearing aids, glasses and or inhalers (where appropriate)	Always being tired, early or late, absent, few friends, regularly left alone, stealing, no money, parent or carer not attending or supportive

Safeguarding Children and Young People Policy & Procedures

Appendix 4 (cont.)

Categories of abuse and neglect as defined in Working Together to Safeguard Children 2018 and Keeping Children Safe in Education 2020

Category of abuse and neglect	Physical Signs	Behavioural Signs
Child sexual exploitation (CSE)	May be similar to those under the categories of sexual or physical abuse (above) including evidence of / suspicions of physical or sexual assault	<ul style="list-style-type: none"> • Acquisition of money, clothes, mobile phones etc without plausible explanation; • Gang-association and/or isolation from peers/social networks; • Exclusion or unexplained absences from school, college or work; • Leaving home/care without explanation and persistently going missing or returning late; • Excessive receipt of texts/phone calls; • Returning home under the influence of drugs/alcohol; • Inappropriate sexualised behaviour for age/sexually transmitted infections; • Relationships with controlling or significantly older individuals or groups; • Multiple callers (unknown adults or peers); • Frequenting areas known for sex work; • Concerning use of internet or other social media; • Increasing secretiveness around behaviours; and • Self-harm or significant changes in emotional well-being.
Child Criminal Exploitation (CCE)	Unexplained injuries and refusing to seek medical help.	<ul style="list-style-type: none"> • Frequently absent from and doing badly in school; • Going missing from home, staying out late and travelling for unexplained reasons; • In a relationship or hanging out with someone older than them; • Being angry, aggressive or violent; • Being isolated or withdrawn; • Having unexplained money and buying new things; • Wearing clothes or accessories in gang colours or getting tattoos; • Using new slang words; • Spending more time on social media and being secretive about time online; • Making more calls or sending more texts, possibly on a new phone or phones; • Self-harming and feeling emotionally unwell; • Taking drugs and abusing alcohol; • Committing petty crimes like shop lifting or vandalism; and • Carrying weapons or having a dangerous breed of dog.



Safeguarding Children and Young People Policy & Procedures

Appendix 5

Applicable Club policies and procedures

Anti-Bullying Policy	Safeguarding Adults at Risk Policy & Procedures
Bullying and Harassment Policy	Safeguarding Children and Young People involved in Matchday Activities
Data Handling and Protection Policy	Safeguarding Policy - Low Level Concerns
Disciplinary Policy	Safeguarding Social Media Policy
Domestic Abuse Policy	Safeguarding Youth Academy Players in the First Team Policy
Ejecting Children and Young People Policy	Searching Children and Young People Policy
Equal Opportunities Policy	Social Networking Policy
Grievance Policy	Transport Policy
Health and Safety Policy	Tours Policy
Host Family Policy	Unaccompanied Children and Young People Policy
Human Rights and Modern Slavery Policy	Whistleblowing Policy
Lost Children and Young People Policy	Youth Academy Anti-Doping Safeguarding Policy
Minimum Unaccompanied Age	Youth Academy Safeguarding Players on Loan Policy
Recruitment Policy (and Safer Recruitment Guidance)	Youth Academy Safeguarding Players Release Policy
Safe Driver	

Relevant legislation, guidance and regulations

Adoption and Children Act 2002	HM Government Working Together to Safeguard Children 2018
Children Act 1989	Human Rights Act 1998
Children Act 2004	Keeping Children Safe in Education (KCSIE) 2022
Children and Families Act 2014	Modern Slavery Act 2015
Counter-Terrorism and Security Act 2015	Police Act 1997
General Data Protection Regulation 2018	Premier League Guidance for Safer Working Practice
Equality Act 2010	Premier League Rules
FA Respect Codes of Conduct	Protection of Children Act 1999
FA Safeguarding Children Guidance	Protection of Freedoms Act 2012
Female Genital Mutilation Act 2003	Rehabilitation of Offenders Act 1974
Forced Marriage Act 2008	Safeguarding Vulnerable Groups Act 2006
HM Government Information Sharing Guidance for Practitioners 2015	Sexual Offences Act 2003

These lists are not exhaustive.



Safeguarding Children and Young People Policy & Procedures

Appendix 6

Multi-use consent form



THE ARSENAL FOOTBALL CLUB PLC GENERAL CONSENT FORM – UNDER 18s SEASON 2020/21

A. ACTIVITY

Name of Event/Detail	
Date(s) or Time Period	

B. PARTICIPANT'S DETAILS

Name	Firstname	Surname
Date of Birth		
Address		
	Post Code	
Home Phone Number		
Mobile Phone Number		
Email Address		
School/College Name and Address (if relevant)		

C. PARENT/LEGAL GUARDIAN/CARER DETAILS

Name	Firstname	Surname
Relationship to child		
Address		
	Post Code	
Home Phone Number		
Mobile Phone Number		
Email Address		

D. PHOTOGRAPHS, IMAGES AND VIDEOS

I, the undersigned, by ticking the box below, hereby grant or deny permission to The Arsenal Football Club PLC and all of its associated companies (the "Club") to use photographs, images and/or videos of the child named in Section B (the "Imagery"), in all media now existing or invented in the future, on a worldwide basis and in perpetuity. Uses include the display, distribution, publication or other use of the Imagery taken during the Activity. I agree that the Imagery may be (i) used by the Club and its associated companies for any purpose (including but not limited to marketing and/or promotional use) or (ii) provided to a third party for its purposes (including but not limited to marketing and/or promotional use). I understand that my child's full name, if aged under 16, will not be listed in conjunction with the Imagery unless explicit consent is sought.

Grant permission

Deny permission

E. TRANSPORT AND SUPERVISION

If transport by the Club is NOT required: The Arsenal Football Club PLC (the "Club") requires your consent to allow the child named in Section B to travel to/from the venue of the Activity alone.

I consent to the child travelling to/from the venue alone.

I do not consent to the child travelling to/from the venue alone. I agree that I shall be responsible for arranging supervision of the child when travelling to/from the venue.

If transport by the Club is required: The Arsenal Football Club PLC (the "Club") requires your consent to allow the Club to transport the child named in Section B during the Activity. Transport includes transportation provided by the Club to and from the Activity (where necessary and appropriate in line with the Club's transport procedures). I, the undersigned, hereby grant or deny permission to the Club, to transport the child named in Section B.

Grant permission

Deny permission

The Arsenal Football Club PLC (the "Club") requires your consent to allow the Club to supervise the child named in Section B during the Activity. Supervision includes being in sight or earshot of a Club employee or worker for the Activity. I, the undersigned, hereby grant or deny permission to the Club, to supervise the child named in Section B.

Grant permission



Safeguarding Children and Young People Policy & Procedures

Appendix 6 (cont.)

Multi-use consent form



Deny permission

F. INDIVIDUAL NEEDS

I, the undersigned, provide the below information in relation to the child named in Section B to assist The Arsenal Football Club PLC with the performance of the Activity, to ensure that the child's individual needs are considered (please circle as appropriate):

Dietary & Allergies	Disability & Access Needs	Provide details here, e.g. times medication must be taken, if help is required to administer medication, additional religious/faith needs and access needs.
Medication	Religious & Cultural Needs	
Any other needs		

G. EMERGENCY CONTACT DETAILS

In an emergency, if different from the individual named in Section C above, the following person should be contacted:

Name		
Relationship to child		
Address		
	Post Code	
Home Phone Number		
Mobile Phone Number		
Email Address		

H. MEDICAL

I, the undersigned, acknowledge and fully understand the nature of the Activity and that participation in the Activity may give rise to harm or injury to the child named in Section B. I confirm that the child is physically fit enough to take part in the Activity and that any relevant medical conditions have been declared to the Club.

I agree that the child's participation in the Activity is at their own risk and hereby release the Club, its employees, contractors, agents and all of its associated companies (together, "Arsenal") from all liability, responsibility, costs and damages which arise as a result of the child's participation in the Activity. For the avoidance of doubt, the foregoing does not affect the child's legal rights in the event of personal injury or death arising as a result of the negligence of Arsenal.

If the child sustains any harm or injury due to participation in the Activity, Arsenal may, in its sole discretion, offer to provide such medical treatment as it determines necessary or appropriate (the "Medical Treatment"). I hereby consent to emergency Medical Treatment determined necessary by Arsenal and acknowledge that by allowing any non-emergency Medical Treatment to be performed on the child, I (and the child) will be deemed to have consented to such Medical Treatment. If the child receives any Medical Treatment, emergency or non-emergency, I and the child assume all risk of harm or injury which may result (subject to the immediately preceding paragraph).

I. SAFEGUARDING

The Club is committed to safeguarding and protecting children and young people, and adults at risk. Please see the Club's safeguarding policies at https://www.arsenal.com/sites/default/files/documents/Safeguarding_Children_and_Young_1.pdf and https://www.arsenal.com/sites/default/files/documents/Safeguarding_Adults_at_Risk_0.pdf.

J. SIGNATURE AND EXPIRY

I, the undersigned, consent to The Arsenal Football Club PLC storing and processing the above referenced personal data in accordance with all relevant data protection laws. You may withdraw this permission at any time. For further details, see the privacy policy at www.arsenal.com/privacy-policy or write to the Data Protection Officer, The Arsenal Football Club plc, 75 Drayton Park, London N3 1BU.

Signature of Parent/Legal Guardian/Carer	Date	
Print Name		

Safeguarding Children and Young People Policy & Procedures

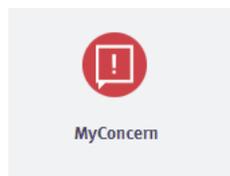
Appendix 7 – Health & Safety Incident Reporting

Link to log into the Club's [Accident Management System](#)

Link to log into the Club's [Health & Safety Flag It System](#)

Appendix 8 – Safeguarding Reporting

Link to log into [MyConcern](#) to file a Safeguarding Concern



myconcern ![®]

Email Address

Password

Log in

Link to access the Club's [Safeguarding Concern Form](#) for staff members without access to MyConcern



Safeguarding Children and Young People Policy & Procedures

Appendix 9

Key Safeguarding Contacts

The Club

Head of Safeguarding

Adam Brown 07701 296 182
abrown1@arsenal.co.uk

Safeguarding Manager

Michael Hagan 07801 988 346
mhagan@arsenal.co.uk

Safeguarding Manager

Laura Munson 07721 720 167
lmunson@arsenal.co.uk

Designated Whistleblowing Officers

Stuart Wisely 07730 695 070
swisely@arsenal.co.uk

Karen Smart 07736 545 364
ksmart@arsenal.co.uk

Disability Access Manager

Jon Dyster 07716 084 306
jdyster@arsenal.co.uk

The Premier League

Head of Safeguarding

Jess Addicott 020 7864 9000
Safeguarding@premierleague.com

The FA

Safeguarding Team 0800 169 1863
Safeguarding@TheFA.com

The Police

Emergencies 999
Non-Emergencies 101

London Borough of Islington Children's Services

Referrals 020 7527 7400
csctreferrals@islington.gov.uk

Emergency Duty Team 020 7226 0992

Prevent prevent@islington.gov.uk



Safeguarding Children and Young People Policy & Procedures

Appendix 9 (cont.)

Local Authority Designated Officer (LADO)

Timur Djavit

020 7527 8066

lado@islington.gov.uk

Islington Safeguarding Children's Board

Wynand McDonald

020 7527 4209

wynand.mcdonald@islington.gov.uk

Other Agencies

NSPCC Helpline

0808 800 5000

NSPCC Helpline for footballers who experienced sexual abuse

0800 023 2642

Childline

0800 1111

National Association for Children

0800 085 3330

Abused in Childhood (NAPAC)

www.napac.org.uk

CEOP

www.ceop-police.uk

Safer Internet Centre

0844 381 4772